AIRBUS

Multiannual Digital Accessibility Scheme

2024-2026

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I. INTRODUCTION

1. What is Digital Accessibility?

Disability is defined as "any limitation of activity or restriction of participation in society affecting a person in his or her environment due to a substantial, long-term or permanent impairment of one or more physical, sensory, mental, cognitive or psychological functions, multiple disabilities or a disabling health disorder" (Article L. 114 of the French Social Action and Family Code).

Digital accessibility consists of making online public communication services accessible to all people with disabilities, i.e.:

- **Perceptible**: facilitating the user's visual and auditory perception of the content; offering text equivalents to any non-text content; creating content that can be presented in different ways without losing information or structure (e.g. with a simplified layout);
- **Usable**: providing the user with guidance for navigating and finding content; making all functionalities accessible from a keyboard; allowing sufficient time for the user to read and use the content; not designing any content that may trigger epileptic seizures;
- **Understandable**: ensuring that pages work in a predictable way; helping the user to correct data-entry errors;
- **Robust**: optimising compatibility with current and future uses, including assistive technologies.

2. Concerned contents

Online public communication services are defined as any provision to the public or categories of the public, by electronic communication, of signs, signals, writing, images, sounds or messages of any kind which do not have the character of private correspondence (article 1 of French Law no. 2004-575 of 21 June 2004 on confidence in the digital economy).

In accordance with II of article 47 of the aforementioned French Law of 11 February 2005, they include in particular:

- Internet, intranet and extranet sites; software packages, insofar as they constitute applications used via a web browser or a mobile application;
- Mobile applications, which are defined as any application software designed and developed for use on mobile devices, such as smartphones and tablets, regardless of operating system or hardware;
- Digital street furniture, for their application or interactive part, excluding operating systems or hardware.

Certain content is exempt from the accessibility obligation and falls outside the scope of the legal requirement:

- Files available in office automation formats published before 23 September 2018, unless they are necessary for the completion of an administrative process falling within the tasks carried out by the organisation concerned;
- Pre-recorded audio and video content, including content with interactive components, published before 23 September 2020;
- Live audio and video content, including content with interactive components;
- Maps and online mapping services, provided that, in the case of maps intended to provide a location or route, the essential information is provided in an accessible digital form;
- Third-party content that is not funded or developed by the organisation concerned and is not under its control;
- Reproductions of items from heritage collections that cannot be made fully accessible due to:
    - Accessibility requirements are incompatible with the preservation of the item concerned or the authenticity of the reproduction, particularly in terms of contrast;
    - The unavailability of automated and cost-effective solutions that would make it easy to transcribe the text of manuscripts or other items from heritage collections and render it in the form of content compatible with the accessibility requirement;
- The content of intranets and extranets published before 23 September 2019, until such time as these sites undergo a major overhaul;
- The content of websites and mobile applications that are neither necessary for carrying out an active administrative procedure nor updated or modified after 23 September 2019, in particular archives.

3. Legal framework

Article 47 of French Law No. 2005-102 of February 11, 2005 for Equal Rights and Opportunities, Participation and Citizenship of People with Disability, and French Decree No. 2019-768 of July 24, 2019 on the accessibility of online public communication services to people with disability determine the obligation of accessibility for online public communication services.

They also provide details on the implementation of the accessibility requirements, as well as the methods of communication for the associated actions, in particular:

- The publication of an accessibility statement for each online public communication service concerned;
- The publication of a multiannual accessibility scheme.

To facilitate the accessibility of these services, the French Interministerial Digital Directorate (DINUM) publishes the General Framework for Improving Digital Accessibility (RGAA), the latest version of which is V4.1.2.

Pursuant to Article 47 of French Law No. 2005-102 and French Decree No. 2019-768, in this 2024-2026 multiannual scheme, Airbus provides details of all the actions implemented to make its services accessible.

II. AIRBUS' ACCESSIBILITY GUIDING PRINCIPLES

Airbus is demonstrating its commitment to digital accessibility by implementing a number of actions aimed at complying with article 47 of the law of 11 February 2005 and the decree of 24 July 2019.

Airbus has a long history of promoting Inclusion and Diversity, with dedicated teams and concrete actions such as the ones carried out by these teams for Airbus' global footprint and specifically the Disability Mission in France. In this way, Airbus' Inclusion & Diversity team, in co-responsibility with the Digital Accessibility project team, are responsible for drawing up, monitoring and updating this multiannual Digital Accessibility plan and the associated annual action plans.

These teams are in charge of supervising the correct implementation of accessibility standards, delivery of training to employees, accessibility audits realisation and user feedback collect, thereby ensuring that all users, including those with disabilities, receive a high-quality service.

These efforts are reflected in Airbus ongoing commitment to digital accessibility.
Digital accessibility is at the heart of concerns linked to the development or provision of digital services (websites, platforms, applications, etc.).

Also, taking digital accessibility into account at Airbus requires:
- Adapting the internal organisation for producing and managing the websites and applications concerned;
- Support for staff;
- Changes to procurement procedures;
- Support for people with disabilities when they report difficulties;

The different parts below describe the key points which Airbus will use to improve the digital accessibility of all its websites and applications.

III. HUMAN AND FINANCIAL RESOURCES

1. Audit and Corrections

In response to regulatory requirements for digital accessibility, Airbus has initiated a compliance programme for its websites and digital services, based on audits and corrections, with the assistance of external experts.

a. *About Airbus.com websites*

With the aim of improving accessibility at a wider level, a high focus has been set up on our major websites:
- Airbus.com accessibility should rise to 70% at the end of 2024 and to 86% in 2025.
- Acj.airbus.com accessibility will be increased from 46% in 2022 to 73% in 2025.
- Aircraft.airbus.com accessibility will be increased from 54% in 2022 to 89% in 2025.
- Airbusworld.helicopters.airbus.com has an average conformity rate of 63.9% in 2024.

Focus on a "leader by example" corporate website, the portal of Airbus Helicopters in the frame of RGAA 4.1 audits:
- In 2024: Audit and correction of major accessibility issues to reach:
    - 70% partial conformity for public content
    - 50% partial conformity for other applications
- In 2025:
    - 75% partial conformity for public content
    - 65% partial conformity for other applications
- In 2026:
    - 85% partial conformity for public content
    - 75% partial conformity for other applications

Additionally, Airbus Helicopters' HR and Digital teams have launched actions such as accessibility awareness campaigns and communications, and are regularly leading the way in increased accessibility consideration of digital accessibility at group level while being part of central initiatives. More details are available by visiting this page.

At group level, our dedicated teams are in the process of completely overhauling our website design which has been done by Numerik-ea, a Digital Accessibility external auditor (validation

of UI mock-ups and review of developments after delivery), and Numerik-ea is due to carry out the new post-revamp audits (end of 2024).

   b. _About the Hub_

The Airbus Hub is the intranet that facilitates the management of information and internal communication. It enables Airbus to provide an ideal central space for easily sharing company information and communicating effectively internally. The Airbus Hub is therefore a website in its own right and has therefore been audited in the same way as the "Airbus.com" website.

Following the Airbus.com audit done previously, Airbus Launched in 2023 an accessibility Audit to make the Hub more accessible for disabled people.

In addition, it helps Airbus to emphasise/embrace the Accessibility topic for its inclusion and diversity charter, newcomer profile attractivity, branding images purposes, etc.

This audit follows the French General Accessibility Improvement Guidelines (RGAA 4.1) and was launched hand in hand with the help of Numerik-ea on a large range/wide panel of content displayed into the Hub: for example on Communities, Post, Comments but also on the Hub main page: Home page, Employee Services, Business Apps, etc. The results statement was made on 23 October: 49.3% of the RGAA 4.1 criteria are respected.

Before the end of the year 2024, the target is to reach 54% and a "Partially Compliant" status. In 2025, the target is to reach 70% of compliance and the ambition for 2026 is to be close to 100% compliant.

2. Taking into account employee requests

Airbus will affirm its commitment to taking into account and considering employees' requests concerning digital accessibility and assistive technologies. To this end, Airbus is currently implementing, and will continue to implement, a number of initiatives developed below.

Airbus is in the process of defining an operating model for Commercial Aircraft concerning the management of devices and software, in particular: ordering and logistics, licence management, incident and request management, update, industrialisation in ServiceNow and the review of the catalogue of devices and software.

Work is also underway on the creation of guidelines for and the implementation of digital support for the native functionalities of each available OS (catalogue of services, user guide, software, etc.). Airbus also has a number of equipment test campaigns in the pipeline for inclusion in the catalogue, notably in France with bone conduction headsets.

A dedicated intranet subsite on Inclusion and Diversity topics exists highlighting Airbus' position on Inclusion & Diversity issues, cross-country committees, a calendar of events and a 'Disability' section dedicated to Digital Accessibility. Every employee can find general information aboutDigital Accessibility, examples of tools used cross-country, a reminder of the reference framework (RGAA 4.1 and WCAG 2.1), a set of user guides specific to Spain and France and to the various Airbus entities (Commercial Aircraft, Airbus Helicopters, Airbus Defence and Space, Airbus S.L.C. and Airbus Cybersecurity).

By mid-2024, Airbus plans to add to the 'Digital Accessibility' section of the Inclusion & Diversity an intranet subsite and another independent subsite.

Airbus will also create an intranet subsite dedicated to technical teams involved in the Disability Mission (HR teams, Occupational Medicine, etc.) and employees with OETH or in the process of acquiring hardware or software. This intranet subsite will contain tools, stocks of equipment for employees with disabilities, reference documents, various processes, recommendations and guidelines to help IT teams develop their skills. The intranet subsite is planned for May 2024 and will be updated every year.

In addition to these actions, Airbus plans to carry out satisfaction surveys on the tools integrated into the OS, the software and hardware deployed by the Digital teams.

Airbus will share this initiative across the group.

These actions are scheduled to be implemented by 2026 at the latest.

In the same spirit of harmonisation, Airbus wants to simplify the declaration of disabilities during the onboarding phase of a new employee, so the teams dedicated to the Disability Mission will be coordinating and working with the HR teams to achieve this. For the moment, this project will focus on France, but Airbus wants to extend this simplification to other countries.

3. Communication, awareness and training

a. *About corporate communication & accessibility culture development*

Airbus is actively engaged in raising awareness of inclusion through a Disability Management Guide, which is constantly updated and available to employees on Airbus intranet and through the ecosystem of actors who work around disability.

Awareness is further enhanced through regular initiatives such as 'Disability Week', as well as targeted events that cultivate an ongoing and in-depth awareness of disability and inclusion issues among staff, with a dedicated focus on digital aspects.

Also, Airbus is planning a Mission Handicap event. This event will take the form of an exhibition clearly explaining the Digital Accessibility mission at Airbus and will enable everyone to clearly identify the players (publishers, manufacturers, technical teams, etc.) involved in this project.

These efforts reflect Airbus' commitment to building a corporate culture that is open and accessible to all.

      b. *About training and competence development*

Airbus has started assessing training needs and is currently formalising its competence strategy through a multi-year programme focusing on digital accessibility. This plan has been initiated since 2022 and is being conducted until 2026, with the aim of improving our teams' skills in this specific area of knowledge.

This training plan takes into account the mapping of impacted jobs, the details of "proficiency levels" to be reached for each job and the mapping of existing training and the identification of "to be updated" and "to be launched" modules. This also includes the setup of a network of actors who will support the development and the deployment of learning content across the Company, as well as the estimation of budget requested to reach training objectives at group scale.

As part of this initiative, Airbus already introduced three e-learning courses specific to Microsoft Word, PowerPoint and Excel to enable our employees to acquire essential accessibility skills (as Airbus has switched to Google Workspace, these training needs to be adapted). Airbus' digital accessibility training approach includes the creation of training programmes aimed at raising awareness and providing best practice and know-how for designers and developers, who are key stakeholders when it comes to enhancing information systems and websites accessibility.

In the coming two years, Airbus will pursue developing digital accessibility competences by:

- Continuously updating and adapting its competence strategy;
- Enriching its competences referential for impacted jobs (Developers, digital content owners, IT managers and digital services purchasers mostly);
- Scaling up proven initiatives like development of training contents, training at webfactories level for industrialisation of actions;
- Continue getting specific support from Digital accessibility specialised companies.

4. Production processes, organisation of tests and controls

The Digital Accessibility team develops processes and manages activities to fulfil the IT needs of people with disabilities. With the Inclusion & Diversity team as privileged partner, the Digital Workplace team puts in place actions to provide adapted solutions for disabled employees when required. As mentioned earlier in the text, the Digital Accessibility project is divided into different working groups and activities, including the following activity groups: Supply Chain

Processes, Catalogue Packages, ITSM, and Permanent Improvement. The actions developed below fall into one or more of the work packages listed above.

The production of digital tools at Airbus follows a centralised model within the Information Management (IM) function, ensuring consistent and compliant management of digital projects through a project monitoring committee that prioritises and oversees initiatives.

The Airbus Design System provides resources to designers and developers to best align applications with the Airbus' brand identity and accessibility standards. Airbus currently complies with WCAG 2.1 (AA level) and is preparing for the adoption of WCAG 2.2 in 2024.

First and foremost, Airbus is committed to taking stock of and fine-tuning all NatCo (National Companies) processes for existing hardware and software.
At the end of 2024, Airbus wishes to continue or create, if necessary, test campaigns on hardware and software (bone conduction earphones) and wishes to implement these test campaigns in all NatCo. Airbus also intends to duplicate test protocols for NatCo.

Also at the end of 2024, Airbus plans to implement requests processes, in particular the creation of service request(s) based on automated processes.

Over the next few years, Airbus plans to implement processes for employees with specific needs: this will be done on an as-needed basis, either via a circuit-based system or via a software licensing system.
Also, in the interests of harmonisation, Airbus wants to industrialise all these processes at NatCo. Of course, Airbus will take all necessary steps to ensure that the processes described above comply with the relevant security rules. In addition to these measures, Airbus will continue to create processes and procedures linked to the Supply Chain Process work package.

As explained in a previous section, a subsite intranet accessible to users will enable them to access the catalogue of functionalities (Windows, Mac, Google).
Airbus also intends to study the creation of a catalogue of packages for each disability, with hardware and software proposals.

In the coming years, Airbus wishes to industrialise the new requests in all NatCo by following the recommendations and feedback of the "Supply Chain Processes" and "ITSM" working groups.

Finally, Airbus will deploy a customer survey on distributed devices and software to better understand user needs and the relevance of the solutions proposed, supplied and envisaged.

5. Digital Accessibility Governance

Implementing a Digital Accessibility framework involves thinking about the internal organisation of all the entities (departments and services) that must contribute to the digital accessibility project. This review should make it possible to define the conditions for ensuring compliance of the websites and digital applications concerned through various actions: support for staff, modification of contractual procedures, information systems policy, consideration of internal or external requests for adaptation, etc.

A digital accessibility monthly cross-country committee has been set up since 2023, including representatives in each country, to highlight best practices and synergies in order to ensure that accessibility practices are integrated throughout the organisation. This exists alongside the local Disability Steering Committee for France for fostering employment and inclusion for French people with disabilities

In 2024, a formal steering committee involving Information Management actors from different services, HR specialists, Communication and Training experts, will be implemented four times a year to monitor our initiatives around training, awareness-raising and the implementation of accessibility strategies.

6. Purchasing Policy and supplier relationships

Airbus' objective is to identify the purchasing categories impacted by digital accessibility and to define specific criteria in this respect. Airbus is therefore actively committed to integrating digital accessibility into its relationships with its suppliers. These criteria will be deployed throughout Airbus' relevant digital activities and will be integrated into future calls for tenders, in order to reinforce our commitment to develop an inclusive digital accessibility.

Below are the criteria which are embedded in the relevant digital calls for tender since 2023:
- The digital services supplier shall include the accessibility level (according to the WCAG referential) for people who are in any situation of disability (Vision, Hearing, Mobility, etc.) of the products in its catalogue.
- The digital services shall respect the WCAG 2.1 (IEC 40500)/French RGAA standard for its website and any web development while:
    - Quantifying the accessibility level of the products and services provided
    - Providing the number of employees dedicated to the deliverables who are trained and/or certified

IV. ACTION PLAN

Taking into account the information gathered during the preparation of this plan, the complexity of the sites and applications, their prioritisation and their assessment in terms of feasibility, the compliance operations will be spread over the years 2024, 2025 and 2026.

The organisation is committed to working with external contributors as necessary to effectively strengthen our approach to digital accessibility. This is essential to support our ongoing digital transformation, turning a necessity into an opportunity.

1. Planned actions summary table

Topic	Planned actions & initiatives	
	2024	**2025 & 2026**
Audit and Corrections	• **Corporate Websites:** Post revamp audit (corporate website fully renewed in 2023) with the subject matter expertise, the Digital Accessibility auditors by end of 2024 • **Intranet (HUB):** Following audit performed in 2023, reach 70% of compliance with the RGAA standards for Communities, Post, Comments but and Hub pages	• **Corporate Websites:** Lead and deliver audit based corrections on corporate websites (Acj.airbus.com, Airbus.com, Aircraft.airbus.com, Airbusworld.helicopters.airbus.com) • **Intranet (HUB):** Pursue improvement on the same scope to reach 80% end of 2025 and close to 100% compliant at the end of 2026
Taking into account employee requests	• Finalise and deploy employee request operating model (for device and software ordering, logistic, licence management, incident & request management and services catalogue) • Broadcast guidelines and digital support for native functionalities of each available OS (Catalogue of services & software)	• Transfer the knowledge and harmonise with other divisions (UK, SP, GE) • Deploy a simplified declaration process of disabilities in the onboarding phase for a new employee for France, then for other countries • Update, enrichment and group wide deployment of ongoing pilots and initiatives
Communication, awareness and training	**Corporate communication and awareness:** • Perform an annual show with "mission handicap", including digital accessibility Airbus key actors & external actors (Software Editors and equipment manufacturers, fabricants and specialised partners • Enhance awareness on digital disability challenges among staff during the "Disability	**Corporate communication and awareness:** • Renew yearly annual show with "Disability Mission" & "Disability week"

	week", led by "Inclusion & Diversity" HR teams **Training and competence development:** ● Finalise the Digital Accessibility competence strategy (impacted jobs, skills matrix and proficiency levels, academic and training means) ● Continue deploying training programmes for designers and developers ● Revamp existing e-learning modules dedicated to desktop basic Windows applications (Word, Powerpoint and Excel) where Airbus has moved to google workspace environment	**Training and competence development:** ● Continuously updating and adapting its competence strategy ● Enrich its competences referential for impacted jobs (Developers, Digital Content Owners, IT Managers and Digital Services purchasers mostly) ● Scale up proven initiatives like development of training contents, training at webfactories level for industrialisation of actions
Production processes, organisation of tests and controls	● Set up working groups, in particular to manage actions relating to Supply Chain Processes, Catalogue Packages, ITSM, and Permanent Improvement ● Continue/create test campaigns on hardware and software, then implementation of these campaigns all NatCo ● Provide the features catalogue on the dedicated subsite intranet and creation of a catalogue of packages for each disability	● Implement processes for employees with specific needs: automation of processes for simplified procurement of hardware/software. ● Harmonise all processes in all NatCo ● Carry out an employee survey

Digital Accessibility Governance	● Map all Digital Accessibility actors at group level and organise a Digital Accessibility to align on vision and 3 years objectives (Digital Accessibility scheme)
	
	● Launch of the Digital Accessibility quarterly steering gathering all Management actors from different services, HR specialists, Communication and Training experts
		● Leverage mobilised network and associated governance to :
		  ○ Update the group Roadmap
		  ○ Update the multiannual scheme
		  ○ Adjust organisation to both employees and new regulations & requirements

Purchasing Policy and supplier relationships*	● Include Digital Accessibility requirements within the technical criteria for some selected call for tenders for digital subcontracted activities ● Set up the monitoring of Digital Accessibility requirements in suppliers' proposals	● Generalise the Digital Accessibility requirements for all relevant digital call for tenders ● Improve the implementation and monitoring of these criteria in order to ensure their efficiency ● Identify if any additional Digital Accessibility requirements need to be added into the relevant digital calls for tenders

2. Digital Accessibility transformation map

Here below a summary of planned actions & progress for 2024-2026 per key streams of activities:
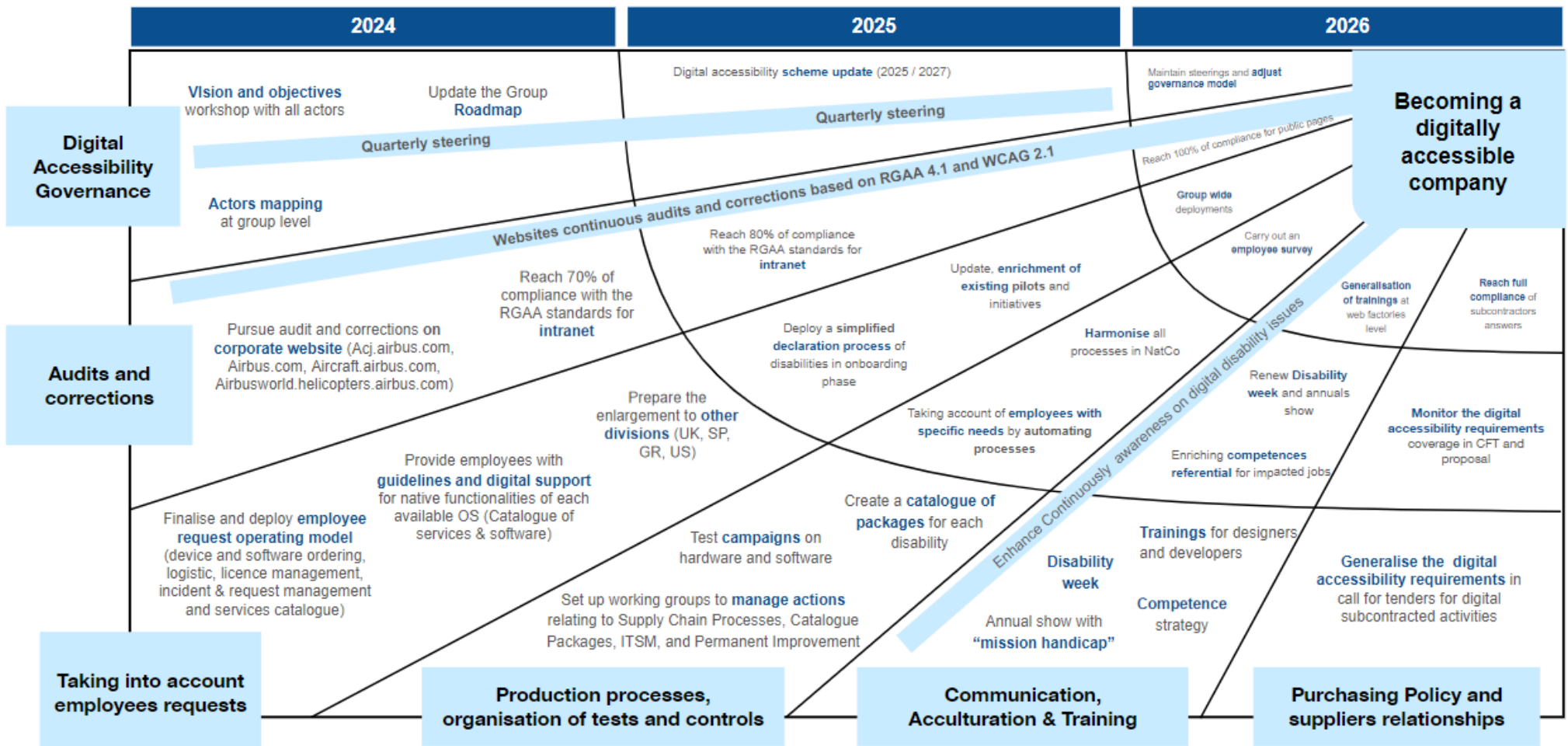
APPENDICES

1. Technical and functional scope

a. _Census_

Airbus companies manage several dozen internet, extranet and intranet sites and numerous applications for the public and its staff.

b. _Assessment and Qualification of Digital Resources_

Sites and applications are/will/should be systematically evaluated according to specific criteria:

- Traffic: Measurement of the active use of resources.
- Service rendered: Assessment of usefulness and relevance for users.
- Criticality: Strategic and operational importance of the resource.
- Lifecycle: Forecast of the next major update or redesign.
- Technologies used: Analysis of the technologies involved and their compatibility with accessibility standards.

As part of this assessment, particular attention is paid to derogations from the RGAA 4.1 when it is impossible to ensure full accessibility, in particular for:

- Third-party content: such as user publications or external data.
- Archiving: Conservation of obsolete content for legacy reasons.
- Massive downloads: Accessibility management for voluminous content, especially that which is more than two years old.

For these cases, the reasonable accommodation approach is adopted, i.e. adapted modifications that do not constitute a disproportionate burden for Airbus. Where full compliance is too onerous or complex, alternatives are considered to allow access to information.

It is essential to flag inaccessible content, inform the user of its location and proportion on the site.

Airbus undertakes to provide accessible solutions within a reasonable timeframe, thereby respecting the right to compensation of disabled people.